

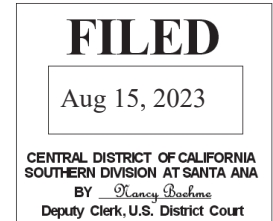
21AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original

## UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

MICKEY SCHULTE,

Defendant.

Case No. 8:23-mj-00414-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 10, 2023 in the county of Orange in the Central District of California, the defendant violated:

*Code Section*

21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)

*Offense Description*

Possession with Intent to Distribute Cocaine

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

/s/

Complainant's signature

Dillon C. Titus, DEA, Task Force Officer

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone

Date: August 15, 2023

  
Judge's signature

City and state: Santa Ana, California

Hon. Douglas F. McCormick, U.S. Magistrate Judge

Printed name and title

AUSA: Jake Nare (ext. 3549)

**AFFIDAVIT**

I, Dillon C. Titus, being duly sworn, declare and state as follows:

**I. INTRODUCTION**

1. I am a Task Force Officer ("TFO") with the United States Department of Justice, Drug Enforcement Administration ("DEA"), and have been so employed since May 2020. I am currently assigned as a TFO at the Los Angeles Field Division ("LAFD"), Orange County District Office ("OCDO"). As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

2. Prior to being assigned as a TFO with the DEA, I worked patrol as a full-time sworn law enforcement officer with the Placentia Police Department ("PPD"). I have been a sworn law enforcement officer since January 2018. Throughout my law enforcement career, I have investigated individuals and criminal organizations that represent a significant threat to public safety and national security. Specifically, during my employment, I have received comprehensive, formalized instruction, including on such topics as drug identification and criminal law. I have participated in numerous investigations into the unlawful importation, manufacturing, possession with intent to distribute, and distribution of narcotics and

controlled substances, the laundering of narcotics proceeds, and conspiracies associated with narcotics offenses. In conducting these investigations, I have utilized a variety of investigative techniques and resources, including but not limited to surveillance and telephone toll analysis.

3. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am also familiar with how narcotics traffickers transport and distribute narcotics in areas they control. I am familiar with how drug traffickers utilize counter-surveillance techniques to avoid detection by law enforcement. I also know that drug traffickers often communicate with their drug-trafficking associates through cellular telephones. I have become aware that more sophisticated drug trafficking networks now utilize email, cell phones, voice over internet protocol, video chat, internet messaging services, and social networking sites to communicate with one another. During drug-related communications, traffickers often use coded or cryptic language to disguise the drug-related nature of their conversations. I also know that if narcotics or narcotic proceeds are seized by law enforcement,

the subject will continue to "work" to pay off what had been seized.

4. Due to the emerging use of the "dark web" and digital currency by drug traffickers, I have become familiar with both and have investigated schemes of crime utilizing them in furtherance of their users' drug trafficking and money laundering activities.

## **II. PURPOSE OF AFFIDAVIT**

5. This affidavit is made in support of a criminal complaint against and an arrest warrant for Mickey SCHULTE ("SCHULTE") for a violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(ii), Possession with Intent to Distribute Cocaine.

6. The facts set forth in this affidavit are based upon information obtained from other law enforcement personnel, my personal knowledge, and my training and experience. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

## **III. SUMMARY OF PROBABLE CAUSE**

7. Based on my investigation in this case, review of investigation reports, and debriefings with law enforcement officers, I am aware that on August 10, 2023, SCHULTE was arrested after the DEA and Placentia Police Department searched

his residence and found SCHULTE in possession of approximately 3,657 gross grams of suspected counterfeit Adderall pills, 230.8 gross grams of suspected psilocybin mushrooms, 8,406.8 gross grams of suspected cocaine, 57.6 gross grams of suspected ketamine, 364.8 gross grams of suspected MDMA, 172.9 gross grams of suspected fentanyl<sup>1</sup>, and two handguns.

#### **IV. STATEMENT OF PROBABLE CAUSE**

8. During August 2023, the DEA received information from a source of information ("SOI") regarding a drug distributor, SCHULTE, who was suspected of routinely selling large quantities of cocaine and fentanyl in the greater Los Angeles area.<sup>2</sup> The SOI provided a cell phone number for SCHULTE, 714-482-3426 ("SCHULTE's phone"). Investigators also learned SCHULTE had an active warrant of arrest for California Penal Code 4563.6 - Possession of Drugs in Prison and California Health and Safety Code 11375(b)(2) - Possession of Controlled Substance.

9. According to the SOI, SCHULTE recently contacted the SOI and sent him/her a photograph and a video of numerous packages of what appeared to be cocaine. SCHULTE told the SOI that he possessed the suspected cocaine and the SOI could view the product whenever she/he wanted. The SOI provided the

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<sup>1</sup> Suspected fentanyl is not field tested by the Drug Enforcement Administration as a safety procedure. Official laboratory tests are pending.

<sup>2</sup> The SOI is cooperating with law enforcement in the hope of receiving consideration for a possible sentence following a 2023 arrest, although no promises have been made. The SOI has been convicted of Assault with a Deadly Weapon in 1998, Grand Theft in 2009, four counts of Restraining Order Violation in 2010, Willful Cruelty to a Child in 2014 and Grand Theft in 2018.

photograph and video to DEA TFOs.

10. After viewing the photograph and video, TFO Taketa authored a GPS phone ping ("ping") warrant to locate SCHULTE, which was authorized by the Honorable Margaret Bernal, Los Angeles County Superior Court Judge, on August 9, 2023.

11. On August 9, 2023, at approximately 4:13 p.m., investigators began receiving pings from SCHULTE's phone. The majority of the pings for the evening of August 9, 2023 and August 10, 2023, indicated SCHULTE's phone was in the area of an apartment complex called Promenade at Irvine Spectrum. Investigators utilized open source databases and discovered Sean Myers ("Myers"), a known alias of SCHULTE based on SCHULTE previously utilizing the name to lease an apartment in the city of Brea, California, and Fanny Alarcon ("Alarcon"), SCHULTE's suspected significant other based on SCHULTE's social media posts, both had a previous listed addresses of 5134 Molino, Irvine, California, which is an apartment at Promenade at Irvine Spectrum.

12. On August 10, 2023, I drove through a parking structure for building five at the Promenade at Irvine Spectrum, where 5134 Molino is located. In parking space 019, I observed a white 2014 Jeep Wrangler bearing California license plate 8XWG049 (registered to SCHULTE at 120 East La Habra Boulevard, La Habra, California 90632) ("SCHULTE Jeep"). In parking space 018, I observed a white 2013 Honda Accord bearing California license plate 6YXM751 (registered to Alarcon, 5134 Molino, Irvine, CA 92618) ("Alarcon Honda"). Just east of the parking

structure, I observed a white 2017 BMW 4-series bearing temporary California license plate CE34N35 (registered to Myers, SCHULTE's known alias, at 293 North State College Boulevard, apartment 2008, Orange, California 92868) ("Myers BMW").

13. I contacted an employee in the leasing office who confirmed that Alarcon had an active lease for 5134 Molino, Irvine, California. The employee further advised 5134 Molino is a two-bedroom and two-bathroom apartment located on the first floor of building five at Promenade at Irvine Spectrum. The employee also stated parking spaces 018 and 019 were assigned parking spaces for] 5134 Molino.

14. I then went onto the website for Promenade at Irvine Spectrum and viewed a virtual tour of the apartments. In the virtual tour, I observed that the apartments had distinctive kitchen islands and immediately recognized the base of the kitchen island from the videos the SOI received from SCHULTE containing the suspected cocaine.

15. Based on my training, experience and knowledge of the investigation, I believed SCHULTE was currently residing at 5134 Molino, Irvine, California and was currently in possession of kilograms of suspected cocaine.

16. I then authored a search warrant for 5134 Molino, Irvine, California, which was authorized by the Honorable Margaret Bernal, Los Angeles County Superior Court Judge, on August 10, 2023. The search warrant additionally authorized investigators to search the SCHULTE Jeep, Alarcon Honda, Myers BMW and any other vehicles in the control of any person named in

the search warrant.

17. On August 10, 2023, at approximately 6:00 p.m., the DEA and Placentia Police Department ("PPD") established surveillance on 5134 Molino Avenue, Irvine, California. I reviewed the recent pings from SCHULTE's phone and observed they were not in the area of the residence at 5134 Molino Avenue, Irvine, California.

18. At approximately 6:19 p.m., I observed the Myers BMW driving northbound on Gitano and turn eastbound on Antivo, near 5134 Molino Avenue. After losing sight of the Myers BMW temporarily, I relocated the vehicle parked on Antivo just north of 5134 Molino, Irvine, California. At this time, the Myers BMW was unoccupied. Parked directly in front of the Myers BMW was a U-Haul bearing Arizona license plate AH28490. PPD Detective Austin Martinez located and contacted SCHULTE in the shrubbery located just south of the Myers BMW and just north of 5134 Molino, Irvine, California. In SCHULTE's possession, PPD Detective Martinez located keys to the Myers BMW and the U-Haul.

19. Investigators then executed the search warrant on 5134 Molino, Irvine, California. No one was located inside the residence.

20. During the execution of the search warrant, I asked SCHULTE where he was coming from and where he lived. SCHULTE stated that his girlfriend, Alarcon, resided at the location, but that he was currently living at 16592 Tiburon Place, Huntington Beach, California and had a storage unit at 2750 East Imperial Highway, Unit 7, Brea, California. SCHULTE later



changed his story and stated he did in fact reside at 5134 Molino, Irvine, California with Alarcon. I asked SCHULTE what kind of contraband was located inside 5134 Molino, Irvine, California and SCHULTE stated there was four ounces of cocaine located in a safe under the bed and a firearm which belonged to his friend in a backpack in the closet. I asked about the U-Haul and SCHULTE advised he was in the process of moving.

21. During a search of 5134 Molino, Irvine, California, Investigators located the following items:

a. 137.1 gross grams of m30 blue pills consistent with Oxycodone, but believed to be fentanyl.<sup>3</sup>

b. 44.3 gross grams of orange pills consistent with Adderall or counterfeit Adderall.

c. 230.8 gross grams of dried brown mushrooms believed to be psilocybin mushrooms.

d. 933 gross grams of a white powdery substance believed to be a cutting agent.

e. 942 gross grams of a white powdery substance believed to be a cutting agent.

f. 203 gross grams of a white powdery substance consistent with cocaine. Later at the OCDO, the white substance was tested using a Tru Narc handheld narcotics analyzer and tested positive for cocaine.

g. 57.6 grams of a white powdery substance consistent with ketamine. Later at the OCDO, the white

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<sup>3</sup> Based on my training and experience in other drug related investigations, I know that m30 Oxycodone pills are often counterfeited with fentanyl which are then sold on the street.

substance was tested using a Tru Narc handheld narcotics analyzer and tested positive for ketamine.

h. 124.8 gross grams of a brown rock like substance believed to be MDMA.

i. 35.8 gross grams of blue m30 pills consistent with Oxycodone, but believed to be fentanyl.

j. 208.8 gross grams of a white powdery substance believed to be cocaine.

k. 90.3 gross grams of a white powdery substance consistent with cocaine. Later at the OCDO, the white substance was tested using a Tru Narc handheld narcotics analyzer and tested positive for cocaine.

l. 240 gross grams of a brown rock like substance believed to be MDMA.

m. A pill press with white powdery residue.

n. A digital scale with white powdery residue.

o. 3,612.7 gross grams of orange pills consistent with Adderall or counterfeit Adderall.

p. A black and white Glock 9MM handgun, bearing serial number BXYV555.

q. A black Sig Sauer P220 handgun, bearing serial number 37C023371.

22. During a search of the U-Haul, investigators located the following items:

a. 3,251.1 gross grams of a white powdery substance contained in three brick like bundles wrapped in plastic wrapping with "Mercedes" written on the packaging, believed to

be cocaine based on the appearance of the packages and SCHULTE's statement admitting that the bundles contained cocaine after they were located.

b. 4,653.6 gross grams of a white powdery substance contained in four brick like bundles wrapped in plastic wrapping with "Donald Trump" written on the packaging, believed to be cocaine based on the appearance of the packages and SCHULTE's statement admitting that the bundles contained cocaine after they were located.

23. The list of items located at 5134 Molino, Irvine, California and in the U-Haul are solely a summary of the items seized during the search warrant and should not be considered a complete inventory.

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**V. CONCLUSION**

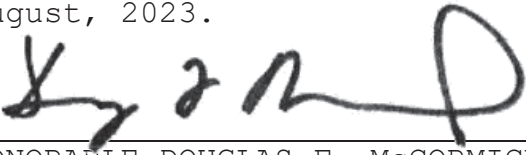
24. For all the reasons described above, there is probable cause to believe that SCHULTE has committed a violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(ii), Possession with Intent to Distribute Cocaine.

/s/

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Dillon C. Titus  
Task Force Officer, Drug  
Enforcement Administration

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this 15th day of  
August, 2023.



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HONORABLE DOUGLAS F. MCCORMICK  
UNITED STATES MAGISTRATE JUDGE